

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KRAFT FOODS GLOBAL, INC., THE)	
KELLOGG COMPANY, GENERAL)	
MILLS, INC., and NESTLÉ USA, INC.,)	
)	
Plaintiffs,)	No. 1:11-cv-08808
)	
v.)	Judge Steven C. Seeger
)	
UNITED EGG PRODUCERS, INC.,)	
UNITED STATES EGG MARKETERS,)	
INC., CAL-MAINE FOODS, INC. and)	
ROSE ACRE FARMS, INC.)	
)	
Defendants.)	
)	

AGREED MOTION TO ENTER PROPOSED TRIAL STIPULATIONS AND ORDERS

The Parties, by and through their undersigned counsel, respectfully move the Court to enter the Parties' Proposed Trial Stipulations 1–6 and 12–16. In support of this Motion, the Parties state as follows:

1. On August 26, 2022, following meet and confers regarding motions *in limine*, the Parties agreed to several trial stipulations and filed Proposed Trial Stipulations 1–6 and Order. (Dkt. 160.)

2. On September 2, 2022, following continued meet and confers, the parties filed Proposed Trial Stipulations 7–11 and Order. (Dkt. 181). The Court entered the order on September 7, 2022. (Dkt. 182).

3. On September 19, 2022, following continued meet and confers, the parties agreed to further trial stipulations and filed Proposed Trial Stipulations 12–15 and Order. (Dkt. 211.)

4. The Court has not yet entered the Orders for the Proposed Trial Stipulations at Dkts. 160 and 211.

5. Additionally, in light of the Court's ruling regarding deposition designations (Dkt. 299), the Parties have met and conferred regarding a majority of the deposition designations and prior trial testimony and jointly agreed to Trial Stipulation 16 regarding deposition designations, without prejudice to any of the Parties' positions regarding the admissibility of any other evidence.

6. Accordingly, the Parties respectfully request that this Court enter Proposed Trial Stipulations 1–6 and Order, Proposed Trial Stipulations 12–15 and Order, and Proposed Trial Stipulation 16 and Order.

WHEREFORE, the Parties respectfully request that this Court grant this Agreed Motion and enter the proposed Trial Stipulations, as submitted as Proposed Orders¹ to this Court contemporaneously with this Agreed Motion.

Dated: September 25, 2023

Respectfully submitted,

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¹ The Parties updated the captions and signatures blocks for the prior proposed trial stipulations and orders.

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